

Email Received on July 11, 2008

To whom it may concern,

Sundial Energy, Inc., a renewable energy and energy efficiency supplier and developer, supports a unified testing and certification procedure. As the DOE procedure is more advanced in its development, the EPA should support it. A watered-down requirement for residential lighting will not advance this developing industry and could lead to slow adoption due to poor products coming to market before they are technically ready.

Issues of longevity, efficacy, and safety will be determinants to adoption by the marketplace, and cost will relate to the first two issues. The customer will need to see clear benefits on those first two issues in order to be willing to purchase an initially more costly light, and safety must be a given.

A split in the federal agencies treatment of the industry for Energy Star designation will sow confusion and delay adoption of these important energy efficient lighting systems. By adopting a less stringent certification procedure, at the behest of certain manufacturers, EPA appears to be allowing new products to come to market before they are ready. Requiring DOE CALiPER testing for all SSL lighting products that would be sold in the U.S. market is the proper way to make sure the product will meet the demands of the public. It is time to bring the residential lighting industry under the same certification procedures as the commercial/industrial sector.

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